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Public Comments on the Draft 1990 RPA Program

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Introduction

Public comments, along with other evaluation factors, were used by the USDA Forest Service and other Department of Agriculture officials to develop the Recommended 1990 RPA Program, which was then submitted by the Secretary of Agriculture to the President for transmission to Congress. The goal of the analysis presented in this report is to summarize comments in a manner that reflects preferences and concerns as well as the reasons for respondents' opinions.

The first section of this report – Analysis System – describes how the analysis was done and includes an explanation of the coding system. The second section – Demographics – includes a discussion of how the Draft RPA Program was distributed and a description of respondent categories. The third section – Comments – contains generalized categories of comments and demographics of those who addressed each category.

Analysis System

The analysis system is based on standard procedures, found in USDA Forest Service Handbook 1609.15, that have been developed to objectively summarize responses. Incoming comments were grid-stamped and coded according to geographic origin of the respondent, interest affiliation of the respondent, and a respondent identifier. Each response was read, and each major idea or comment was coded separately. These separate ideas were entered and stored in a computer data base. All comments for a given role, issue, or strategy could then be retrieved to identify "common threads" of opinions and preferences.

The analysis focuses on public preferences and the reasons for those preferences. When respondents commented on a role, issue, or strategy, the appropriate role/issue/strategy number was coded. After opinions, reasons, and topics were identified and coded, they were grouped and analyzed to produce this report.

All original letters and other supporting documentation are filed for inspection in the Washington, DC, Office of the USDA Forest Service.

Demographics

The Draft 1990 RPA Program was distributed to approximately 12,000 individuals, interest groups, and government agencies and officials. In addition to direct mailing, notice was given through public announcements in the *Federal Register* and other publications as well as through direct contacts by Forest Service officials.

The Forest Service received 231 responses within the 90-day public comment period; an additional 20 were postmarked later. Although all responses received were read and considered, only the 231 received by the end of the 90-day comment period are included in this analysis. Responses were placed in the following categories and shown in Figure 1:

Agencies:	Federal	11
	State	38
	County	8
Interest Groups:	Timber Company or Association	25
	Mining, Oil, Gas Groups	5
	Range Groups	10
	Local Community Groups	7
	Recreation Groups	8
	General Conservation	5
	Wildlife Groups	9
Other:	Retired Forest Service	8
	Academic or Professional Society	5
	Unaffiliated Individuals	70
	Miscellaneous Others	22

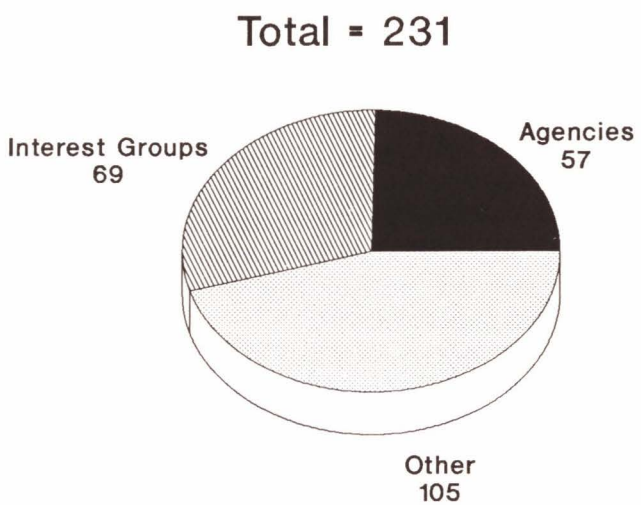

Figure 1--Distribution of respondents by affiliation. State agencies provided approximately two-thirds of comments received from agencies. Timber companies accounted for almost 40% of interest group responses. Unaffiliated individuals submitted about 70% of comments in the other category.

It is important to remember that this sample represents only those people who knew of the opportunity to review the Draft RPA Program and chose to comment. The respondents do not necessarily represent a statistically reliable cross section of the American public.

Comments

Public responses are summarized by the major components of the RPA Program—roles, issues, and strategies—or as general comments. Information for roles and issues is quantified by the number of comments; the information on strategy preference, by number of respondents. The "number of comments" refers to the number of times this topic was discussed, not the number of respondents. A respondent may have commented on several aspects of the same topic, which would account for a greater number of comments than respondents. Respondents, however, could only show preference for one strategy. There were 231 respondents and 1,962 comments.

Respondents' comments tended to be consistent with the views of their affiliation; therefore, the respondent group often is highlighted. Comments that show no affiliation describe comments common enough to be recognized but that follow no pattern of affiliation.

Roles

Multiple-Use and Future Resource Opportunities

Number of Comments: Of the 97 total responses to these two role statements, 71 were on the Multiple-Use Role.

Who Commented: About 20 of the responses were from **timber interests**, another 20 from **unaffiliated individuals**, and about 15 from **State agencies**. The remaining responses were scattered among other interest groups.

What Was Said: Virtually all of the **agency** and **community** respondents supported a multiple-use agenda for the Forest Service, and most agreed with the proposed future role. Respondents frequently cited the importance of a "balance" among resources and uses, but balance meant different things to different groups. Most of the respondents suggesting modification were in the **unaffiliated individual** category, and they generally preferred to see a shift from what they perceived as a commodity orientation to a noncommodity/protection-of-ecosystem role. Respondents affiliated with **mining, oil, and gas interests** felt that the Draft Program implied that minerals are outside the scope of multiple-use management. These respondents suggested that it be stated that minerals are a valid management objective and are consistent with other management objectives contained in the Draft Program.

Nearly half the responses to the Future Resource Opportunities role suggested a similar commodity to noncommodity shift. A number of **agencies** were explicit in their support of using incentive programs and technical assistance through State and Private Forestry to increase timber production on private lands.

- Continue the multiple-use philosophy, but balance outputs:

  "A more appropriate statement should be developed that emphasizes *balance* among resources...Furthermore, the Forest Service should not only encourage multiple resource management and planning, but also strive to be the leader and champion of a conservation and land stewardship ethic for the Nation."

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"We commend the proposal to maintain the multiple-use concept as presented in all five strategies."

"We strongly feel that moderately increasing outputs of timber or other commodities is compatible with the Forest Service mandate of multiple-use, at least in many areas of the western region...the philosophy of enhancing our ability to provide resources in the future...will provide future generations with the opportunity to utilize this important resource."

- Acknowledge that mineral development is a valid management objective:

"Does any emphasis exist for use of land for oil and gas exploration and/or production? It should!"

"In the Multiple-Use Management section, no mention is made of geothermal drilling or leases on National Forest System lands. (Already, about 350,000 acres have been leased)."

- Increase the use of incentive programs and technical assistance through State and Private Forestry to increase timber production on private lands:

"These programs should be expanded so that the private landowner takes an ever increasing role in supplying our Nation's timber resources while decreasing some of the production demands on our national forests."

"We believe that the final role the United States Forest Service takes in regard to private lands must include support for cost-sharing and incentives which will encourage the use of professional forest management services funded in part by United States Forest Service programs."

Response to Comments: The 1990 RPA Program continues the agency's historical and legislatively mandated role of supporting multiple-use and sustained yield. The premise underlying this role is that typical areas of forests or rangeland can compatibly produce multiple resources, and this capability can be enhanced by careful management. Finding the most compatible blend of resource uses is central to the Forest Service's management philosophy. Shifts in balance of outputs are reflected in the proposed future role through enhanced recreation, wildlife, fisheries, and soil and water resource programs on National Forest System lands. Nationwide, timber and rangeland grazing outputs on National Forest System lands are maintained at levels that are relatively stable in relation to past levels of use, with some downward adjustment as necessary to meet specific objectives, such as threatened and endangered species. State and Private Forestry will increase efforts to provide assistance for multiresource planning consistent with landowners' objectives, as well as technical and financial assistance for implementation of those forest resource plans. Forest Service Research supports these programs by increasing emphasis on developing techniques that will enhance compatible production of multiple resources and provide better understanding of major ecological issues.

Shifts in the minerals program are also addressed in the future role—the Forest Service will increase the access for minerals development within a multiple-use context, where it can be accomplished in an environmentally acceptable manner. The Forest Service will give greater attention to opportunities within each national forest to take advantage of the varying production potential of specific sites in providing different resource outputs.

The 1990 RPA Program recognizes the opportunity to increase timber production on Nonindustrial Private Forest lands. State and Private Forestry's management assistance to nonindustrial private forest landowners will moderately increase technical and financial assistance to stimulate timber production within the context of those multiresource plans. There will also be an increase in technical and financial assistance for the related forest resources addressed in the forest management plan, such as wildlife habitat and water-quality improvement.

Local Economies

Number of Comments: There were 55 comments on this role.

Who Commented: About 15 comments were from **agencies** and about 10 from **unaffiliated individuals**. The remainder were from a variety of interest groups.

What Was Said: Most **agencies** and **communities** supported Forest Service involvement in local economies, but often suggested economic diversification. **Unaffiliated individuals** often had concerns about Forest Service involvement in local communities. Timber-dependent groups (**companies** or **communities**) saw a Forest Service responsibility in the area of maintaining timber production.

- Stay involved in local economies, but help with diversification:

  "The Forest Service must become a leader in assessing indirect economic benefits accruing to rural communities from other resource-based use of public lands, and preserve long-term options for future Americans through improvements in management for range condition, riparian areas, biological diversity and vegetation management."

  "We agree that there must be increased efforts toward providing resource programs and retraining assistance to help timber-dependent communities diversify."

- Be cautious with involvement in local economies:

  "The Forest Service's mandate is not economic development [but] proper management of its forests."

  "These should be sustainable economies and resource extraction should not be increased where jobs are being lost due to technological change in the industry."

- Provide support to timber-dependent communities:

  "The Forest Service's contribution to local economies should not be underestimated. Our future resource opportunities probably affect, more directly, a greater number of Americans than any other portion of this Draft. Whether by timber harvesting, servicing tourists, or drilling for oil, the resources of our State and National Forests provide at least 500,000 jobs in the private sector."

  "We believe the Forest Service has the responsibility to help maintain the health of local economies particularly where there are large tracts of public lands and where the predominant use is timber production...Provisions must be made to stimulate and maintain local economies when large tracts of land are withdrawn to protect endangered species such as the spotted owl."

Response to Comments: The 1990 RPA Program will increase Forest Service efforts to contribute to strong diversified local economies within the bounds set by the future roles in multiple-use management and future resource opportunities. The Forest Service will work in partnership with local communities to plan courses of action to satisfy local economic needs. As part of the Department of Agriculture's rural development and revitalization initiative, the Forest Service will also work in partnership with other agencies to provide assistance to promote economic vitality and diversification.

The agency will emphasize National Forest System management that will build and support a strong diversified local economy within the multiple-use management role, focusing on whatever resources contribute to this strength. Through the State and Private Forestry program, the Forest Service will concentrate on helping the private sector learn to process and use resources efficiently and to manage private lands efficiently. Forest Service Research will increase efforts to provide information and technology on the resource-based opportunities that can contribute to economic growth, and on the factors that affect the competitiveness of rural economies in the broader national and international markets within which they compete.

In response to comments that there is a need to be cautious in actions designed to stimulate local economies, the 1990 RPA Program recognizes that sometimes such actions will conflict with broad national social and ecological objectives. Many national objectives are identified through Federal legislation, such as sustained-yield requirements, threatened and endangered species requirements, and water-quality standards. Where local objectives conflict with the national objectives identified in those legislative directives, the Forest Service will follow the legislative direction, while attempting to minimize the impact on local economies.

Management in Mixed Ownerships

Number of Comments: Thirty-one comments were received on this role.

***Who Commented*:** About half the comments received were from **agencies**, eight comments were from **unaffiliated individuals**, and the remainder were divided among a number of interest groups.

***What Was Said*:** Most of the **agencies** suggested some form of coordinated resource management (coordinated resource management planning or similar idea). **Agencies** and **communities** expressed some concern that decisions made by the Forest Service will be imposed on other lands. Consolidation of ownership was mentioned by several of the **unaffiliated individuals**.

- Coordinate activities and planning with other managers:

  "Programs are needed that allow the development of joint planning strategies, encourage cooperative inventories and monitoring systems, support the development of compensation strategies, and allow some form of mitigation banking."

  "We urge the Forest Service to continue their leadership role in CRMP [coordinated resource management planning] and expand its emphasis nation-wide."

- Avoid imposing Forest Service management decisions on private lands:

  "...private landowners are concerned that proprietary decisions made by Forest Service on National Forests will be transformed through the political process into regulations that affect State and private lands."

"The issue of more active United States Forest Service involvement on private lands raises some concerns. Our small base of privately-owned land is already limited by the management directives of federal land managers. We do not wish to see additional restrictions imposed on our private lands."

- Consolidate landholdings:

"United States Forest Service needs to look at consolidating public lands in order to decrease ownership fragmentation and increase manageability of land."

"Buy out Wilderness inholdings and most other inholdings so that sensible, ecologically sound fire protection becomes possible."

Response to Comments: The 1990 RPA Program places increased emphasis on improved communication and cooperation with adjacent landowners and land managers and with State and local governments to promote voluntary, mutually acceptable adjustments that make management of intermingled lands more complementary. Coordinated resource-management planning agreements with other agencies for the management of adjacent lands have proven successful, and the Forest Service will continue to enter into such agreements that are mutually acceptable.

In developing the Forest Service role in mixed-ownership conditions, the agency fully recognized that the regulation of forest management on private lands is the role of State and local governments, not the Federal Government. An important part of the agency's philosophy is that forests and rangelands be managed under the principles of sound land stewardship and "caring for the land." However, the agency also recognizes and honors the sovereignty of individual owners in accomplishing their management objectives.

Scientific Information

Number of Comments: Forty-three comments were received on this role.

Who Commented: About 10 comments were received from **unaffiliated individuals**, 10 from **agencies**, and five from **timber interests**. The remaining comments were received from a variety of interest groups.

What Was Said: Virtually all of the comments were supportive of this role. Respondents generally agreed that emphasis should be increased in the area of multiresource ecosystem and environmental research. **Mining, oil, and gas interests** suggested that ecosystem and environmental research should not be such a high priority that it precludes research that will allow development of mineral resources.

- Increase broad-scope ecosystem and environmental research:

"Forest Service research efforts should be re-directed toward providing more scientific information, using an ecosystem analysis approach, as proposed in Strategy 5."

"We believe that increased research efforts to provide information on multi-resource management problems is essential to continued management of all forest lands in the United States. Your proposal to use an ecosystem analysis approach with emphasis on all resources is appropriate."

"I applaud the future role of increased research efforts to peer into the 'macro' issues of environmental changes."

- Do not preclude research that will allow development of mineral resources:

"Better methods of locating the resources in the ground, and development of minimum damage methods of extracting these commodities would seem to be a reasonable goal."

"API [American Petroleum Institute] has no objection to the Forest Service plans for conducting research which provides scientific data on various resource uses, particularly in areas where inadequate information is available to make balanced land use decisions. We do object, however, to application of Forest Service budget allocations to only certain 'high priority' resource values such as endangered species, wildlife habitat, biological diversity, acid rain and global climate."

Response to Comments: There are three major components to the Forest Service Research program described in the proposed future role. One area will focus on understanding the structure and function of Forest Service ecosystems. This includes study of the mechanisms that control ecosystem processes and the interdependency of ecosystem components. This type of research will provide the scientific basis for addressing the productivity of natural systems and natural resource issues related to environmental concerns. It will help managers understand how forest and range ecosystems affect and are affected by natural and human-made environmental changes.

To better deal with increasing conflicts concerning resource issues, Forest Service Research will increase efforts directed to understanding the relationship between people and their natural resources. To help managers enhance compatibility among resource uses, Forest Service Research will increase emphasis on understanding and expanding resource options.

Resource Inventory and Analysis

Number of Comments: Twenty-four comments were received on this role.

Who Commented: About 10 of the comments were from **agencies**, and 5 were from **timber interests**. The remaining comments were spread among the other respondent categories.

What Was Said: About half of the comments suggested more multiresource inventories "to agree with the multiple-use philosophy of the 1990 RPA Program." Several respondents expressed a need for more short-term, issue-driven inventories. **Oil and gas interests** wanted to see more emphasis placed on oil and gas inventories.

- Increase multiresource inventories:

"We think the future role should be bigger than you propose. Specifically, the future inventory and analysis should be expanded to all resources and all land and be collected in a more timely and consistent manner."

"We strongly promote improving National Forest System inventories of resources other than timber and improving techniques to monitor effects of management activities. United States Forest Service forest inventories on non-National Forest System land should include non-timber resources as well."

- Be prepared to answer short-term issue-driven questions:

  "Current issues such as the northern spotted owl and old growth forests need to be resolved in a timely manner. To resolve these conflicts, accurate inventories and analysis are required. We strongly agree with increasing emphasis on inventories and analysis to answer these questions."

  "We agree that inventory emphasis should broaden to include resources other than timber, encourage increased cooperation with other agencies, and prepare to answer short-term, issue-oriented questions."

- Increase oil and gas inventories:

  "Moreover, such inventories are vital components of land management plannning, and we believe the Forest Service will be unable to make logical, rational land management planning decisions without increasing its oil and gas resource inventory and analysis. Such a deficiency in planning will serve only to further hinder the Forest Service's ability to make and defend its land use decisions."

  "Increasing oil and gas resource inventory and analysis is imperative to a strong defense of the Forest Service's legally mandated multiple-use land decisions."

Response to Comments: The Forest Service will continue its recent efforts to broaden the inventories on National Forest System lands to include nontimber resources. Increased monitoring efforts are an important component of resource management, and policymakers need better data about the condition and trends of all renewable resources to make informed land management decisions.

Inventorying lands outside the National Forest System will continue with emphasis on the timber resource. Conducting such inventories will increase opportunities for cooperation with other agencies as they inventory other renewable resources and gain a broader understanding of forest resource trends. Improved information about forest health—for example, the effects of atmospheric deposition and global climate changes on forest ecosystems—is essential to public policy and management decisions.

The Forest Service will emphasize designing inventories to answer questions of immediate, often regional interest, such as the inventory of old-growth forests in the Pacific Northwest or timber supply trends in a specific region.

Natural Resource Communication

Number of Comments: There were 32 comments on this role.

Who Commented: Responses were from a broad array of interest groups. The largest group was **agencies** with nine comments. **Unaffiliated individuals** and the **timber industry** each had five comments.

What Was Said: Virtually all comments on this subject were supportive of the role. Several respondents, however, suggested the need for more basic natural resource information, and some suggested that the Forest Service has traditionally done a poor job of advertising itself. Most interest groups that commented on this role suggested that the Forest Service should do a better job of explaining the benefits to be derived from a particular resource or position.

- Provide the public with more fundamental natural resource information:

  "We would applaud increased activity by the Forest Service to provide basic information on natural resource topics both to decision makers and the public at large."

  "The public needs to have less propaganda from the Forest Service and more educational material that is scientifically sound. The agency should manage our resources upon the latest scientific understanding, not on the basis of local public pressure."

  "We agree that the agency needs to increase its efforts in providing basic information on natural resource topics, emphasizing activities that increase public understanding of natural resource issues. This effort should be based on public opinion polls that identify public values and attitudes so that appropriate management practices and public information packages can be designed."

- Do a better job of selling the agency:

  "This cannot be overly emphasized. The Forest Service has traditionally done a terrible job of advertising itself."

  "The agency could develop a much greater role for itself in educating the American public about forests, forestry, resource values and the environment. In so doing, it could build greater trust and credibility with the vast majority of our nation's citizens who have a limited understanding of natural resource management, but an increasing interest in environmental issues."

- Do a better job of selling individual programs:

  "The Forest Service needs a broad-based public relations effort to improve the public image of public land grazing."

  "American Petroleum Institute is concerned that the Forest Service has done little to educate the public on energy issues."

Response to Comments: The future role of the Forest Service in natural resource communications is to increase efforts in providing basic information on natural resource topics, emphasizing activities that increase public understanding of natural resource issues. Increased environmental education programs will address a broad range of resource issues and will emphasize explanation of ecological and environmental concepts.

The agency will take advantage of opportunities to forge partnerships with others in the natural resources community to expand communications. When appropriate, the Forest Service will take the initiative in establishing forums for exchanges of views that might lead to conflict resolution. The objective of these forums will be to provide better information for policymakers in their deliberations as well as to stimulate productive exchange among different segments of the public.

International Forestry

Number of Comments: Fourteen comments were received on this role.

Who Commented: This role received two comments from **unaffiliated individuals** and two from **county officials**. The remaining comments came from interest groups.

What Was Said: Virtually all of the comments were supportive of the proposed expansion of the role. Several respondents expressed specific concern about tropical forestry, and others saw the necessity of expanding the role to incorporate nonforestry considerations.

- Increase efforts in tropical forestry:

  "The Forest Service through its expertise should develop programs that will allow the campesinos of the tropical countries to make a living from the forest without destroying it...agroforestry, fuelwood plantations, etc."

  "The Forest Service should be commended for taking a leadership role in this area. Foresters like to 'manage' but preservation is the best alternative in many areas of the tropics. The Forest Service should work more closely with World Wildlife Fund, Nature Conservancy, and United States AID to protect large natural preserves in the tropics."

- Incorporate nonforestry considerations:

  "Programs must advance the science and practice of all land uses and not only of forestry."

  "It appears that the Forest Service is limiting its sights in this critical area. It must take a greater role in many issues affecting renewable resources world-wide, not in selected portions of the third world."

Response to Comments: The future Forest Service role in international forestry is to expand international programs of technical and managerial assistance, research and scientific exchange, and training to advance the science and practice of forestry in the United States and other countries.

Expanded technical and managerial assistance will be directed specifically to developing countries in the tropics, with particular emphasis on the Caribbean Basin, western Pacific Islands, and Mexico. The expanded research and scientific exchange programs will focus on both temperate and tropical countries. The future role expands into new tropical-area research on natural forest ecology and sustainable management; agroforestry and watershed management; improved utilization of wood and nonwood products; tree breeding, tree improvement, and reforestation; and social and economic characteristics that affect renewable resource management. Expanded training of forest land managers, particularly from tropical developing countries, will focus on efficient organizational and managerial techniques for forestry agencies.

By expanding its role internationally, the Forest Service shows that it is becoming increasingly aware of the relationships among all nations of the world.

Issues

Changing Recreation Needs

***Number of Comments*:** This issue received 52 comments.

***Who Commented*:** Respondents included 15 **unaffiliated individuals**, 14 **agencies**, and 6 **timber industries**.

***What Was Said*:** **Unaffiliated individuals** tended to favor dispersed recreation. **Hunting groups** and **timber industries** favored developed recreation. **Agencies** and **unaffiliated individuals** suggested that the role of State and private lands in providing recreation be discussed.

- Emphasize dispersed recreation:

  "The discussion of recreation...devalues Wilderness by playing down the importance of dispersed recreation in favor of developed recreation...What makes the national forests especially valuable is their ability to provide recreation dependent on wild and natural lands. It is to this type of recreation that the Forest Service must direct its attention."

  "Emphasize dispersed recreation..."

  "Keep human recreation simple and undeveloped."

- Emphasize developed recreation:

  "A largely metropolitan population doesn't need Wilderness when they want boat ramps, ski slopes, hotels, restaurants, and historic site development."

  "Satisfaction with National Forest System recreation will not be increased by additional Wilderness Areas but by more 'day trip areas.'"

- Consider the role of State and private lands:

  "[We disagree with the] inference...that it is difficult to encourage multiple-use management on private lands...Investigate the effects of user fees...as an encouragement to the private landowner to provide recreation for a profit."

  "The response...says nothing about State and Private Forestry's role in providing recreation. Since recreation is part of the multiple-use philosophy, recreation needs should be addressed for State and private lands."

  "...[projected] public demands are clearly compatible with NIPF [Non-Industrial Private Forest] objectives, yet the Draft Program fails to recognize this."

***Response to Comments*:** In new or updated Forest plans, recreation will become a more integral part of the land management planning process, which determines the ultimate mix of recreation opportunities provided. As minority populations and those in older age classes increase, the mix of recreation demanded will change. Emerging trends in preferences include increased interest in

more developed recreation activities closer to urban areas and lessening but still extensive demand for backpacking.

The basic characteristics of national forest recreation experiences—which span a spectrum from developed to primitive—will remain generally as they are today while, at the same time, the quantity and quality mix of experiences offered will shift to respond to changing public recreation needs. The long-term strategy, for example, proposes that wilderness acres increase from 32 MM acres in 1989 to 39 MM acres in 2040; RVD's will increase from 12.2 to 28.7 MM over the same time period. Between 30 and 50 percent of all recreation investments in the future, however, will be focused on recreation developments near urban populations.

State and Private Forestry has the necessary linkages and partnerships that can be combined with other outreach activities, such as the urban forestry program, to provide a coordinated response to changing recreation needs. The National Recreation Strategy has provided a means of addressing problems and opportunties by building strong partnerships with other public organizations and the private sector. Statewide forest resource planning efforts of State forestry agencies can also be used to incorporate more recreation opportunities, especially at the local community level.

Threatened, Endangered, and Sensitive Species

Number of Comments: This issue received 32 comments.

Who Commented: Respondents included six **individuals**, five **wildlife interests**, four **State officials**, and 3 **timber interests**.

What Was Said: Two-thirds of the comments suggested some modifications, but virtually all comments were supportive of the general Forest Service response to this issue. A number of **unaffiliated individuals** stressed the need for protection of species and habitat through biological diversity and ecosystem integrity. **Wildlife organizations** urged that the Forest Service be more aggressive in protection. Several **agencies** stressed the need to coordinate with other agencies and landowners; they also encouraged the Forest Service to enhance its threatened, endangered, and sensitive species research program.

- Increase protection:

  "Habitat protection and species recovery programs for endangered, threatened and sensitive species should be given a very high priority."

  "Protect ALL species! Allow NO new Threatened and Endangered species to develop! Allow NO more extinctions!"

  "The Service...needs to take stronger inititatives than just 'mitigation.'"

- Incorporate biological diversity and ecosystem integrity:

  "The best way to ensure their viability is to protect biological diversity and ecosystem integrity. Piecemeal, species-by-species treatments will become futile as time goes on and more species are listed."

  "Attention must be paid to species rare in an area because they are on the edge of their range. These may be quite different genetically from individuals from the middle of their range. Do not wait until species become federally endangered."

- Coordinate with other agencies and landowners:

  "Management of endangered, threatened and sensitive species should be coordinated with all agencies and landowners involved; concept is especially valid in areas of mixed ownership and for species with large range or habitat need."

  "...[coordinate with] non-Forest Service...activities (such as Bureau of Land Management, United States Fish and Wildlife, and state Fish and Wildlife departments, etc.) to avoid duplication and to provide...consistent information."

- Increase research:

  "Strongly encourage the Forest Service to enhance its endangered, threatened and sensitive species research program."

  "Research should also be a vital component in the response to this issue yet Research's role is not mentioned in the Summary."

Response to Comments: National Forest System Land Management Plans have standards, guidelines, and prescriptions to ensure viability of all animals and plants that live on national forests. In concert with plan implementation, the Chief of the Forest Service designated a task force to examine the Forest Service threatened, endangered, and sensitive species program. The findings are written up in an action plan that will establish the Forest Service in the forefront of species protection with a nationally recognized program for threatened, endangered, and sensitive species conservation by the year 2000.

The 1990 RPA Recommended Program contains two areas of emphasis for wildlife and fish programs, one of which is habitat requirements for threatened, endangered, and sensitive species. By 2010, Forest Service objectives will be met for 171 of the projected 221 federally listed species. Objectives for the remaining 50 will be pursued, but longer times are required to establish the required habitat.

Forest Service units coordinate their programs aimed at species recovery or protection with other agencies and various interested publics. Objectives are stengthened by State and Private Forestry assistance, showing State and private landowners how they can and need to help keep all populations viable.

The Forest Service does recognize that recovery of threatened and endangered species and continued existence of sensitive species are significant parts of maintaining overall biological diversity. The efforts of Research actively emphasize the habitat needs of all species, particularly threatened and endangered species.

Riparian Management

Number of Comments: This issue received 24 comments.

Who Commented: Respondents included six **State agencies**, three **timber industries**, three **wildlife interests**, and three **unaffiliated individuals**.

What Was Said: **State agencies** mentioned the need for improved coordination between the Forest Service and other agencies. **Timber industries** advocated increased research. **Wildlife interests** suggested that the Forest Service re-evaluate existing standards.

- Improve coordination with other agencies:

  "These issues, because of their multiregional or long-term nature, cannot be resolved easily in local planning efforts."

  "We also recommend an emphasis on communication between non-federal landowners and the FS, especially as it relates to the national program for the Stewardship of riparian areas mentioned in the Program."

  "United States Department of Agriculture needs to assure that there is a common definition of riparian area between USFS, BLM, SCS, and Extension."

- Increase research:

  "Practical research is a must."

  "The response in the Summary should include...Research..."

  "...an increased emphasis on research is entirely warranted."

- Re-evaluate existing standards:

  "Riparian standards should not be inflexible. The Forest Service should develop standards that maximize enhancement..."

  "Often on-the-ground administration simply overlooks or ignores riparian management and managers are not initiating actions to achieve desired riparian conditions. Whatever steps...necessary to achieve desirable riparian conditions must be boldly and effectively highlighted..."

Response to Comments: Working through State Foresters and in cooperation with the Soil Conservation Service, State and Private Forestry will transfer to non-Federal landowners information about how certain management actions affect riparian areas. This includes helping landowners to locate riparian areas on their lands and to determine which best management practices would prevent damage to sensitive riparian areas.

The riparian program in Forest Service Research is developing technologies to identify and characterize riparian areas, to assess conditions, and ultimately to help managers protect sensitive riparian ecosystems from onsite impacts and upstream influences. Research is also helping managers identify resource management capabilities to better plan and manage the impacts on riparian areas.

The Forest Service will amend older forest plans as needed to strengthen riparian area management standards and guidelines. Standards and guidelines for other activities, such as mining and recreation, will be strengthened in some plans to reduce impacts on riparian areas. To strengthen future planning and management, the Forest Service will begin a national program for managing and conserving riparian areas on National Forest System lands. This program will encompass the following:

1. Establishing priority action programs in each National Forest System region. These programs will seek to improve riparian conditions for entire watershed basins.

2. Completing a comprehensive inventory of riparian areas and their ecological condition by the year 2000. Regions will set their own timetables, so some inventories may be complete before others.

3. Developing an integrated approach to implementing riparian standards in all forest plans.

4. Placing future Research emphasis on effects of various management practices on watersheds.

5. Establishing clear, attainable goals for improving riparian areas in the immediate future.

Water Quality

***Number of Comments*:** This issue received 29 comments.

***Who Commented*:** Respondents included nine **agencies**, five **unaffiliated individuals**, four **Forest Service retirees**, and four **wildlife interests**.

***What Was Said*: Agencies, wildlife organizations**, and **unaffiliated individuals** agreed that water quality should be a major priority of the Forest Service. Several respondents expressed concern that best management practices (BMP's) are not effectively monitored. **Unaffiliated individuals** and **wildlife organizations** suggested that the effect of chemicals on water quality should be discussed.

- Treat as a major priority:

  "Current Forest Service emphasis on monitoring water quality and fisheries habitat is severely lacking...Nowhere in the Draft is there a proposal to increase emphasis on such programs...The Forest Service should emphasize in its response to the water quality issue a clearly-stated intention to increase the program on monitoring water quality and fisheries habitat."

  "Water quality should be #1 above all other resources. Capacity of all resources should be governed by water quality..."

  "...RPA must include the strongest language possible regarding Water Quality...Not only should you focus on water quality, but also the underground aquifers and surface water supply systems."

- Monitor BMP's:

  "[I recommend that] general management...BMP's as well as land management...BMP's be utilized...[The Forest Service] needs to include pre- and post-BMP monitoring..."

  "The discussion of best management practices (BMP's) should be expanded to explain that BMP's do not guarantee water quality. The application of BMP's should include a monitoring program designed to quantify the success of BMP's and modify their application."

"...often these BMP's are not carried out."

- Acknowledge the effect of chemicals on water quality:

"One wonders [about] the effects on water quality as well as other resources of herbicide use as part of the 'clean up' operations."

"Chemicals are not necessary in forest management, and the negative impacts on water quality and the food chain severely outweigh any benefits."

"...the use of pesticides/herbicides in forest management practices...represents a threat to water quality..."

Response to Comments: To ensure the protection of water and water-dependent resources on national forests, the Forest Service has implemented a nonpoint source management program developed in cooperation with the Environmental Protection Agency and State water agencies. The Forest Service is one of eight USDA agencies that will be participating in the **Water Quality Program Plan to Support the President's Water Quality Initiative**. All three components of the program—education and technical assistance, research and development, and data base development and evaluation—will help to protect and manage this critical resource.

Best management practices protect identified beneficial uses of water, monitor the implementation of specific practices, adjust ineffective practices, and recommend modification of water quality standards to each State. There are three levels of monitoring: implementation monitoring to ensure that the best management practices were applied correctly, effectiveness monitoring to determine whether the protection efforts achieved their objectives, and validation monitoring to determine whether the assumptions and coefficents used in designing the practices were valid. States and members of the public participate with the Forest Service in monitoring activities, particularly in monitoring the compliance with standards and guidelines in forest plans that lead to water-quality protection. In those cases where established BMP's do not ensure protection, the use will be revised accordingly.

The agency is also addressing cumulative effects of management on national forest lands. Forest Service Research plans to conduct more investigations about cause-and-effect relationships between land management activities and water quality.

Air Quality

Number of Comments: This issue received 13 comments.

Who Commented: Respondents included four **agencies** and three **unaffiliated individuals**.

What Was Said: There was little consistency among the comments. Several respondents urged that prescribed burning be retained. Others mentioned that increased research was needed.

- Retain prescribed burning:

"...mention the many positive results from prescribed burning."

"...let the readers know the trade-offs involved when prescribed burning is not done. [They] need to understand that fuel reduction by prescribed burns is...carefully regulated..."

"We do not support alternatives that are more expensive, less safe, or potentially damaging [than] prescribed burning."

- Increase research:

"We support continued research to determine the impact of air pollution on forest ecosystems."

"The Forest Service should take lead responsibility in research on...effects of poor air quality on all natural resources..."

"More partnerships with research institutions should be encouraged."

Response to Comments: The Forest Service, as a member of the National Wildfire Coordination Group, is looking at methods of brush disposal and removal of slash from timber harvest sites without using prescribed fire, which would then diminish smoke as a pollutant. When it is appropriate and approved in a Fire Management Plan, prescribed fire will be used as one tool to help regenerate areas after timber harvest or thinning.

Forest Service Research will continue to lead a coordinated effort to determine the effects of a changing atmospheric environment on the productivity, health, and diversity of forest ecosystems. This research will quantify forest responses to atmospheric deposition and ambient pollution concentrations.

Catastrophic Fires

Number of Comments: This issue received 19 comments.

Who Commented: Respondents included six **agencies** and six **unaffiliated individuals**.

What Was Said: Several groups commented on the importance of allowing fire to help control fuel accumulations. Several **unaffiliated individuals** encouraged more effort in educating people who live near wildlands about hazards of wildfire and about protection measures. **Agencies** recommended continued coordination with all other concerned parties.

- Allow fire to control fuel accumulations:

"...the Clean Air Act, by inhibiting prescribed burning, allows excessive fuel buildups and results in catastrophic fires. The Forest Service should work with the Environmental Protection Agency to develop an understanding by EPA on the importance of fire in ecosystem management."

"...an overzealous fire suppression policy [leads] to conditions of litter accumulation that tend to foster catastrophic fires."

"...selective burning is necessary to ensure a continuing healthy progression in the forest [and] control the ground story timber buildup that leads to devastating fires like at Yellowstone."

- Increase public education:

  "...educate people as to the risks of living within ecosystems that have fire regimes..."

  "...educate the public on the perils of building in fire prone areas..."

  "...[make people] aware of the hazard..."

- Continue coordination:

  "...[coordinate prescribed burning] with state and local officials..."

  "The Forest Service should place greater reliance on local resources."

Response to Comments: The Forest Service will review forest land management plans to determine how well they address vegetation management and the potential for catastrophic fires. The agency also will more intensively manage vegetation on National Forest System lands to reduce flammability. State and Private Forestry provides technical assistance for fuel management on private lands.

In cooperation with other Federal agencies and the National Fire Protection Association, State and Private Forestry has begun a campaign to increase the awareness of people who live in wildlands of the risk of fire and of opportunities to improve fire protection around their dwellings.

The Forest Service alone cannot solve the fire protection problem. State and Private Forestry provides technical information to help State and local governments take action to reduce urban fire problems near wildlands. It also gives technical assistance for fuel management on private lands, especially where wildlands and urban areas meet. Insurance companies, developers, builders, and others will be given information about precautions to take in wildland areas.

Range Condition

Number of Comments: This issue received 37 comments.

Who Commented: Respondents included 10 **unaffiliated individuals**, 5 **agencies**, and 4 **range interests**.

What Was Said: **Range interests** stressed the need to maintain grazing on public lands. Most of the **unaffiliated individuals** urged that grazing be limited or eliminated, or that additional fees be charged.

- Maintain grazing on public lands:

  "Forest Service grazing permits are needed by ranchers who do not have sufficient private land to keep their livestock on year round...If livestock were to stay on private land year round forage production would be decreased...To shift all livestock use to the private lands would devastate the livestock industry."

  "Shifting grazing from Federal to private lands...means...effects on the local communities would be devastating."

"Grazing is not...easily shifted to private lands...there are already huge demands for private lands...I want the Forest Service to maintain or increase the current grazing levels."

- Limit or eliminate grazing:

"Reduce permitted number of livestock until range recovers! Then ENFORCE proper management!"

"The Forest Service should consider reducing or eliminating grazing in areas where it causes environmental degradation, regardless of the legal authorization of grazing."

"It is essential that the "Change on the Range" program incorporate guidelines that do not allow overgrazing of rangeland and that allow for the recovery of damaged grasslands and the development of natural range ecosystems."

- Charge additional fees:

"We believe that federal grazing leases should either graze at an intensity that does not damage the range and other resources or they should pay for or otherwise provide full mitigation for grazing damages."

"The charge for AUM [Animal Unit Month] should be increased considerably. Present fees are unfair to competing ranchers who do not have public land allotments..."

Response to Comments: Forest Service proposals are nearing completion on new measures to describe the quality of rangeland health in terms of land and resource management objectives described in forest plans. A more intensive inventory, analysis, and monitoring of all National Forest System rangelands will be accomplished in the future.

Highest priority management actions will continue to focus attention on those areas where improvement is needed. Where proper management of livestock on unsatisfactory rangelands does not help to improve range condition, grazing will be reduced or eliminated. Some areas currently being grazed by livestock are marginal and uneconomic and will not respond to the application of proper management techniques. Determining whether livestock grazing is to be reduced or eliminated will be made on an allotment-by-allotment basis in accordance with forest plans.

The long-term strategy shows that, between 1989 and 2005, permitted livestock grazing declines by 11 percent, from 10 MM to 9 MM AUM's, then rebounds as rangeland conditions improve to a little above 9 MM AUM's by 2040. The extent of the decline in permitted AUM's will vary geographically depending upon the management objectives, standards, and guidelines outlined in forest plans.

The Forest Service is also intensifying its communication with the livestock industry by building partnerships with ranchers and other interest groups to communicate program changes.

Minerals Development

Number of Comments: This issue received 40 comments.

Who Commented: Respondents included 15 **unaffiliated individuals**, 8 **minerals and oil and gas industries**, 5 **agencies**, and 3 **wildlife interests**.

***What Was Said*: Unaffiliated individuals** were concerned about mitigating the environmental impacts of minerals development and suggested that the Forest Service do everything possible to control damage. A number of **industry** respondents mentioned the need to consider national security in determining the value accorded mineral extraction. Several respondents affiliated with **oil and gas interests** expressed a concern that oil and gas were combined in one category with minerals. They believed that the environmental disruption from oil and gas extraction is minor compared to that caused by hard-rock mining.

- Emphasize mitigation and environmental sensitivity:

  "It is absolutely essential that more efforts be made in the future to control the adverse impacts of mineral extraction activities."

  "An active minerals program responsive to environmental concerns means a limited minerals program. Values deeper than economic ones, such as an unpolluted environment and the undisturbed beauty of the environment are at stake here."

  "Mineral development should not be pursued at the expense of the destruction of forest ecosystems, or to the detriment of water quality. Any mineral development on National Forest land should be performed in areas where these safeguards can be assured."

- Incorporate national security concerns:

  "...oil and gas resources...are urgently needed to assure the nation's future energy security and economic growth."

  "A healthy energy and minerals program is vital to national well-being."

- Differentiate between hard-rock minerals and oil and gas:

  "...the Forest Service appears to consolidate mining and oil and gas as one issue...[this] demonstrates the lack of a strong energy policy on the part of the Forest Service."

  "Referring to oil and gas production as 'mining' creates an illusion of massive long-term disturbance when, in reality, the impacts of oil and gas production are relatively short-term, and reclamation is highly successful...We recommend the recovery process for oil and gas be differentiated from mining and referred to as 'extraction.'"

Response to Comments: The Forest Service, in coordination and cooperation with the Department of the Interior, and guided by legislative direction, administers mineral resources on National Forest System lands.

Forest Service minerals management is designed to give balanced attention to minerals development, other multiple-resource objectives, and the environment. Governed by laws and regulations, the Forest Service administers the minerals program to encourage and facilitate the orderly exploration, development, and production of mineral and oil and gas resources, thereby contributing to a viable and competitive domestic mineral industry.

Under the 1990 RPA Recommended Program, leased acreage increases from 14 million acres in 1989 to nearly 26 million acres in 2040. Locatable minerals are projected to increase about 16 percent during the planning period to nearly 13 million acres by 2040. Forest Service administration

(minerals operations) increases 30 percent from 1989 to 2040, reflecting additional efforts to ensure environmentally sensitive management.

Forest land management plans provide standards and guidelines that ensure environmental protection during development and reclamation activities. The Forest Service was the first Federal agency to require the submission of reclamation plans for minerals exploration and development proposals that could create environmental disturbance. Areas disturbed through minerals development will be reclaimed to productive conditions consistent with multiple-use objectives.

Below-Cost Timber Program

Number of Comments: This issue received 37 comments.

Who Commented: Respondents included 13 **unaffiliated individuals** and 6 **timber industries**.

What Was Said: More than half the comments, mostly from **unaffiliated individuals**, urged that the Forest Service stop below-cost sales. **Timber industry** respondents felt that the Timber Sale Program Information Reporting System (TSPIRS) does not adequately show the benefits of timber activities to other resources.

- Stop below-cost timber sales:

  "I heartily recommend the elimination of all such activities. [They result] in over-harvesting of timber resources and [drain] an agency budget appropriated for national resource management, not welfare."

  "...this situation is a disgrace, and should be eliminated quickly."

  "Below cost sales represent a subsidy for timber and thus distort market dynamics for timber supply. Such subsidies can artificially lower prices for timber for the private sector and result in disincentives for private landowners to invest in forestry..."

- TSPIRS does not show all benefits:

  "TSPIRS does not show all costs and benefits in harvesting timber, especially in the area of recreation and wildlife."

  "We are not confident that TSPIRS will be applied in a way that adequately addresses nonpriced costs and benefits from forest management."

  "We definitely cannot agree that TSPIRS can ever give accurate information concerning Timber Harvesting. There are too many non-timber resources that are not given a dollar value that should have one, such as wildlife, wildlife openings, and trail construction."

Response to Comments: The overall timber management program for all national forests experienced a positive net revenue in fiscal year 1989. The overall net gain in timber revenues was approximately $741.8 million before payments to States and $402.7 million after payments to States. Approximately 132,000 jobs were supported by the program. However, in the statement of revenues and expenses, developed for TSPIRS for 1989, 66 of the 122 national forests had expenditures greater than revenues. These 66 national forests contributed 2 billion board feet of the 11.9 billion board feet harvested on National Forest System lands.

Seven principles are being considered that could guide development of procedures used to implement and refine the below-cost timber program policy. These principles are as follows:

- Improvements in the cost and benefit data will continue to be made.

- Both current and future benefits from the timber-sale program will be considered.

- Several years of cost and benefit data, rather than just one year's data, will be used to make any substantial timber program changes.

- All national forests, irrespective of their cost/revenue balances, will seek ways to improve the cost/revenue balance by decreasing costs and increasing revenues.

- If the timber program on a national forest is to be adjusted, the change will be done gradually to permit affected communities the opportunity to adjust.

- Whenever timber sale levels are substantially reduced, efforts will be made to replace the economic contribution of timber with economic contributions from other natural resources.

- Changes in the level of the timber program will be incorporated in forest plans.

The President's fiscal year 1991 budget includes a one-year test on selected national forests to reduce below-cost sales and expand the recreation program to generate offsetting economic activities. The Forest Service will utilize the seven principles and the results of ongoing evaluations that have been developed to guide implementation of the below-cost timber program policy.

Old-Growth Forests

Number of Comments: This issue received 40 comments.

Who Commented: Respondents included 10 **unaffiliated individuals** and 3 **wildlife groups**.

What Was Said: Nearly two-thirds of the comments were from **individuals**. About two-thirds of the comments, largely from **individuals**, called for reducing or terminating harvests in old-growth stands. Several respondents mentioned that current lawsuits and administrative appeals add urgency to resolution of the issue. Others advocated increasing the amount of research.

- Reduce or stop harvesting:

  "The length of time it takes to grow some of the forests, particularly in Alaska and the Northwest areas, makes it imperative that we save as much as possible."

  "[The Forest Service] has a special responsibility not only to today's citizens but to future generations to protect large undisturbed blocks of old-growth forest...the wealth of information and resources in such a system that we have not even begun to address will be critical in the future."

  "NO MORE Old Growth should be cut! This is an irreplaceable...resource...The aesthetic, health and habitat benefits of Old Growth cannot be weighed in terms of economies. THE LOSS IS IN NO WAY WORTH THE ECONOMIC SAVINGS."

"The only sensible conclusion for old-growth management appears to be an immediate moratorium on harvesting until a thorough ecological inventory has been prepared and analyzed."

- Acknowledge the urgency of the issue:

  "...lawsuits and administrative appeals by environmental groups are blocking and/or delaying Forest Service old growth timber sales."

  "While the draft mentions the need for definition and inventory it does not set a timeline to meet this task. Because of the urgency of this question...I urge the Forest Service to make this an urgent issue."

  "The old-growth issue is of such significance that it deserves a better response...To suggest that because the Forest Service's own inventory and definitions are unreliable today, we must wait until the next generation of forest plans before the issue is properly addressed is totally irresponsible."

  "...we're not sure you are committed to protecting old growth while the issue is being resolved...will the research results be available in time to be relevant?"

- Increase research:

  "Research into the means of mimicking old-growth values in managed stands is encouraged."

  "Research should be conducted to determine the value of old growth forests in providing biological diversity."

  "Continued research should be pursued to characterize and understand old growth forests."

Response to Comments: Where goals for providing old-growth values are of highest priority, old-growth forests on National Forest System lands will be protected. On other areas, using the concepts of New Perspectives for Managing the National Forest System, the Forest Service will manage to provide important old-growth values and other multiple-use benefits. Additional research will be initiated to fully implement the concepts of New Perspectives.

Research and forest management specialists will continue to develop definitions, conduct inventories, develop and implement silvicultural practices and harvesting techniques, and explore concepts of landscape ecology to reduce undesirable effects of forest fragmentation.

Clearcutting

***Number of Comments*:** This issue received 29 comments.

***Who Commented*:** Respondents included 7 **unaffiliated individuals**, 6 **timber industries**, and 3 **wildlife interests**.

***What Was Said*:** Most comments came from **unaffiliated individuals**, though there was also a strong response from the **timber industry**. Many respondents, particularly from the **timber industry** and some **wildlife organizations**, felt that clearcutting is a legitimate tool. Most of the **unaffiliated**

Individuals were adamantly opposed to clearcutting. Several respondents suggested that the Forest Service needs to educate the American public better about the benefits of various harvesting practices.

- Continue clearcutting:

  "In some cases clearcutting by cable on steep areas away from a stream and riparian area can result in much less earth disturbance than traditional harvest methods."

  "Contrary to popular belief clearcutting of small areas adjacent to uncut areas maximizes the habitat for wildlife and has little impact on water quality if done properly...It can also be managed to minimize esthetic damages."

  "We believe that clearcutting is a legitimate management tool."

- Eliminate or reduce clearcutting:

  "...the impacts of clearcutting are too great on some species of wildlife, on water quality and on aesthetics. I strongly recommend that clearcutting be eliminated."

  "I am concerned that clearcuts...will have adverse effects on wildlife..."

  "Where at all possible...clearcutting should be replaced with uneven-aged management and selection harvest methods."

- Increase public education efforts:

  "...your poorest job in education has been the clearcutting issue...You need to do more in public relations concerning this issue."

  "...the public should be informed about why the tool is being used and under what conditions."

Response to Comments: Clearcutting is an appropriate forest harvesting practice, but national forests are looking at reductions in clearcutting when alternatives would meet the same land management objective. In 1989, 320,000 of the 57 million acres classified as suitable for timber harvest were clearcut. That is 0.56 percent of the land suitable for timber harvest and 0.17 percent of the total National Forest System acreage of 191 million. Forest plans indicate an annual clearcut of 440,000 acres by 2040. The Recommended Program decreases this figure to 233,000 acres.

Research is evaluating the long-term effects of alternative harvesting and regeneration methods on timber growth and yield, changes in the compostion of tree species and other vegetation, soil and water quality, wildlife and fish habitat, and other forest values.

Timber Supply from Nonindustrial Private Forest Lands

***Number of Comments*:** This issue received 42 comments.

***Who Commented*:** Respondents included 14 **timber industries**, 8 **unaffiliated individuals**, and 7 **State agencies**.

***What Was Said*: Timber industries** felt that increased timber supplies will not necessarily result from technical and financial assistance. Conversely, others felt that the Forest Service needs to enhance State and Private Forestry's program to accomplish future timber supplies. **Agencies** were concerned that it will be difficult to encourage private landowners to increase production without subsidies or substantial changes in the tax laws.

- Question the effect of technical and financial assistance:

  "You may think that the non-industrial landowner (private land) will increase their supplies over the next 20 years. I think you are going to be in for a real shock."

  "The Draft Program gives the erroneous impression that "x" dollars to State and Private Forestry will result in "y" increase in timber production from Nonindustrial Private Forest Lands."

  "We are not convinced that financial and technical assistance make a dependable source of timber."

- Emphasize State and Private Forestry programs:

  "...still need to continue to improve our forest management programs on other public lands and private lands as well as National Forests."

  "...you should greatly expand the State and Private Forestry program to channel...investments onto more productive and more accessible lands."

- Increase incentives:

  "I encourage the draft to place more resources towards government cost-sharing of tree planting on private lands. The Forest Service should also engage actively in the development of small tree plantations."

  "The emphasis should be on incentives to insure that productive forest land stays that way. Information, education, tax incentives and improved markets are initiatives that could be taken..."

Response to Comments: Nonindustrial private forest lands are expected to be a dependable source of timber supply for the future if landowners are given carefully tailored government assistance. To ensure this dependability, future assistance will include increased multiple-resource management planning assistance that considers the nonindustrial private landowner's objectives. Because these landowners typically are increasingly sensitive to multiple-resource objectives and because they will be called on to supply an increased share of the timber supply in the future, levels of assistance must be higher in the future.

Increased technical and cost-sharing assistance is needed to make use of the timber-growing opportunities available. Many nonindustrial private forest landowners are responsive to cost-share programs for tree plantings that reduce up-front costs. These cost-share programs typically share stand-establishment or timber stand improvement costs, provide tax break incentives, or both. When used jointly, the effects of cost sharing and tax incentives are complementary.

Technical assistance is an essential complement to the success of an effective cost-share program. Technical assistance to landowners is particularly successful in advance of or at the time of harvest. Studies have shown that assistance can significantly increase stumpage revenues in timber sales, making timber harvest more attractive to owners. This provides incentive to management and improves the success and value of subsequent reforestation actions.

The long-term strategy is to plant trees on 1.3 MM acres annually through 2010, and 800,000 acres annually thereafter through 2040, through programs that provide both technical and financial assistance to landowners. Timber stand improvements increase in the early years, peaking at 1.2 MM acres annually in 2000, to meet increased demands for quality softwood timber between the year 2000 and 2010, and to provide followup treatment for increased acreage of plantations.

International Forest Products Competitiveness

***Number of Comments*:** This issue received 12 comments.

***Who Commented*:** Respondents included four **unaffiliated individuals** and three **agencies**.

***What Was Said*:** Several respondents supported the Forest Service response on this issue, but **unaffiliated individuals** were strongly opposed to Forest Service involvement.

- Continue efforts to increase competitiveness:

  "...your work to...enhance the industry's ability to compete at home and abroad is extremely important."

  "[I] support increased emphasis on this issue."

  "[The] Forest Service should emphasize development of potential export markets..."

- Stop efforts to increase competitiveness:

  "Why are we exporting raw logs...at such a bargain price? Other values need to be considered such as resource conservation, [etc.]."

  "...any effort to promote the export of raw materials will take away manufacturing opportunities in this country."

  "The exportation of timber should not be increased..."

***Response to Comments*:** This issue was deleted from the final Program.

Biological Diversity

***Number of Comments*:** This issue received 35 comments.

***Who Commented*:** Respondents included nine **unaffiliated individuals**, three **State agencies**, three **wildlife interests**, and two **timber industries**.

What Was Said: **Unaffiliated individuals** stressed the importance of this issue and urged that management recognize the need to retain areas adequate to maintain diversity of species. **Industry interests**, particularly **oil and gas**, were deeply concerned about the Forest Service response to the issue. They felt that the issue was too vaguely defined and, therefore, that it is premature to react to the issue by reducing commodity production.

- Expand the concept:

  "...clarify that biological diversity will be looked at in a bigger, more universal perspective..."

  "...recognize the need...to provide for the protection of entire ecosystems."

  "Only when you address [biodiversity] as the full component of naturally occurring species and conditions...will you get anywhere."

- Clarify issue:

  "...this rather nebulous concept is not yet sufficiently understood to propose sweeping management action."

  "The Forest Service's increased focus on biological diversity is alarming. This vaguely defined concept could heavily impact oil and gas activities. We suggest the inclusion of the biological diversity scheme is premature and more likely to create unnecessary problems than substantially satisfy other elusive concerns."

Response to Comments: Conserving biological diversity while meeting the needs of a growing human population is a difficult task. Management of biological diversity, like any other resource, requires tradeoffs. Choices are made that may negatively affect other resources, and available options can only alter the rate and direction of change – not stop or completely control it. Accordingly, the Forest Service is acquiring knowledge, implementing conservation measures, and demonstrating land and resource management approaches that conserve biological diversity as an integral part of sustaining overall multiple-use objectives.

No single entity, public or private, can effect a prudent, comprehensive strategy to conserve our natural biota. Difficult choices have to be made regarding how to sustain a biologically rich future while meeting immediate resource needs. Ultimately, we will all be affected by the decisions that are made.

Global Climate Change

Number of Comments: This issue received 24 comments.

Who Commented: Respondents included eight **unaffiliated individuals**, three **timber industries**, and two **national associations of agencies**.

What Was Said: Most respondents encouraged the Forest Service to increase research and to address the seriousness of the issue by expanding its efforts.

- Increase research:

  "We support the research proposed for understanding global climate change."

  "We agree with the Forest Service response that accelerated research programs are needed."

  "Issue needs more research...This issue is of grave concern."

- Expand Forest Service efforts:

  "...the Forest Service should become more proactive worldwide in its efforts."

  "The impact of the Greenhouse Effect could be very serious and it is not too premature to anticipate the problems."

Response to Comments: The effects of possible climatic changes and air pollution on the Nation's forests and rangelands will be the focus of a 10-year Forest Service research program. The program, called Forest Health, Productivity and Diversity in a Changing Atmospheric Environment, is a component of the President's comprehensive U.S. Global Change Research Program.

Research program elements will combine to provide answers and to help understand the processes governing atmospheric effects on forests, help determine effects of forest management on the atmosphere, help monitor long-term effects of atmospheric change on forest conditions, and help define management options based on research results.

To assertively address carbon dioxide emissions in the United States, the Forest Service, in partnership with State Foresters, is entering into an extensive tree planting and forest improvement program. This program, which is part of the President's "America the Beautiful" program, consists of a tree-planting initiative in community forestry as well as a major nonindustrial planting and forest improvement effort. Tree-planting efforts will also produce multiple resource benefits in the future, such as stabilized watershed conditions, timber production opportunities, and wildlife habitat.

Strategies

In this section the number of respondents is indicated rather than the number of comments. Responses were recorded to show how many respondents preferred a particular strategy and the reasons for their preference. Figure 2 shows the preference by strategy.

A description of the individual strategies is found on page 2-9 of the Recommended 1990 RPA Program.

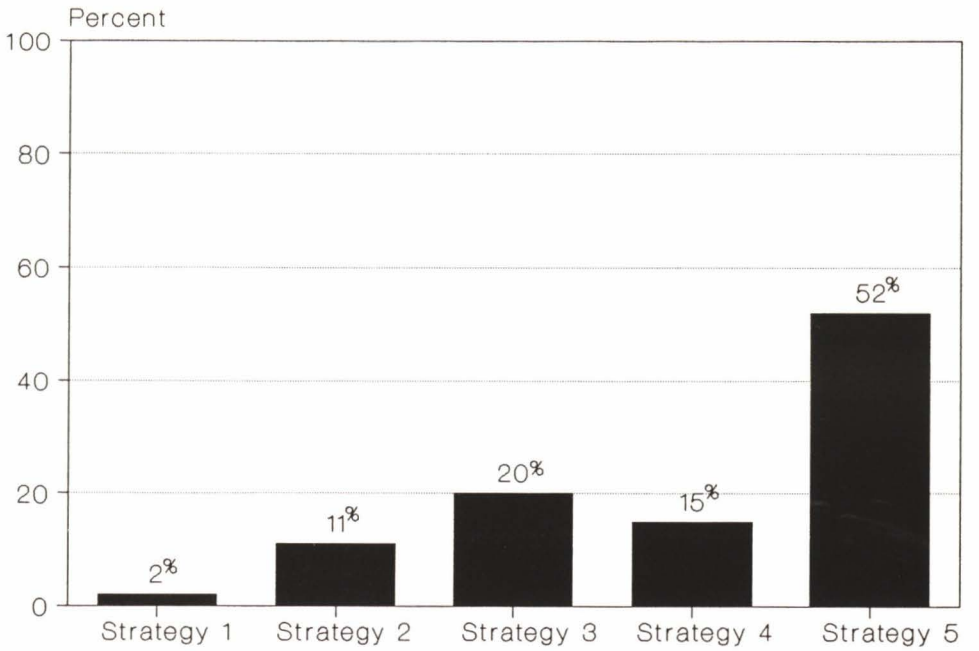

Figure 2--Preference of respondents for a given strategy. Of the 231 total respondents, only 116, indicated a preference for a strategy; over half of those preferred Strategy 5.

Preference for Strategy 1

Number of Respondents: Three respondents preferred Strategy 1.

Who Commented: A **State agency**, a **community organization**, and an **unaffiliated individual** each preferred Strategy 1.

What Was Said: Two of the respondents cited budgetary considerations for their preference. The other respondent gave no reason for preferring this strategy.

Preference for Strategy 2

Number of Respondents: Thirteen respondents preferred this strategy.

Who Commented: Seven of the 13 responses were from **State agencies,** and 2 were from **unaffiliated individuals.**

What Was Said: There was no trend in affiliation. Most respondents chose Strategy 2 because it is tied back to the "local plans" and they felt it best met local issues. Respondents also perceived that it was more "balanced" than the other strategies.

- Tied to local plans:

  "I certainly favor the Strategy 2 Implementation of Local Resource Plans as most realistic, practical, and cognizant of their professional and time consuming preparation."

  "It combines the objectives and outputs of locally developed plans. It is most responsive to those best informed of what each area can support in a productive sustainable manner."

- Best balanced strategy:

  "The outputs of this strategy are significantly increased over strategy 1, are superior to strategy 3 for recreation and wildlife, and are much better balanced than strategies 4 and 5."

  "By implementing the best strategy for each locale, the best strategy for the entire nation will be achieved. It also offers the best balance of growth for all uses."

Preference for Strategy 3

Number of Respondents: Twenty-three respondents preferred this strategy.

Who Commented: All but two respondents represented **State** or **county agencies and officials** or **commodity-interest groups.**

What Was Said: The most common reason for choosing Strategy 3 was that it maximized dollars from all resources, with the corollary perception that it provided maximum public benefits.

- Maximizes dollars from all resources:

  "Strategy 3 emphasizes the economic values of all forest outputs; the strategy will create larger, more diverse rural communitites and create the most jobs; mineral demands will be met more completely; and, recreation quality will be improved."

  "Strategy 3 appears to be the best from an industry standpoint. Soil productivity and air and water quality significantly improve over the planning period due to management and mitigation actions. Recovery objectives for all 166 threatened and endangered species are met. Growing demands for access to explore and develop minerals are all met. Minerals cases processed increase 72 percent by 2040. Increased revenues and net public benefits from national forest increases the role of States in resource management and implements high-priority research initiatives."

- Maximizes public benefits:

  "Feel that Strategy 3 best meets the needs of the citizens of Lake County."

  "Strategy 3 emphasizes the economic values of all forest outputs; the strategy will create larger, more diverse rural communities and create the most jobs; mineral demands will be met more completely; and, recreation quality will be improved."

Preference for Strategy 4

Number of Respondents: Seventeen respondents preferred Strategy 4.

Who Commented: About half the respondents preferring Strategy 4 were from **State agencies**. **Timber interests** and **wildlife interests** each had three respondents preferring Strategy 4.

What Was Said: Respondents who preferred Strategy 4 generally perceived that it best optimized the potential resource mix based on the national assessment of resource availabilty and needs.

- Optimizes outputs based on projected needs from the RPA Assessment:

  "Strategies 2 and 4 are more attractive because they present a much more balanced approach in response to demands projected either through local resource plans or the RPA Assessment."

  "Appears to optimize the potential resources mix based on national assessment of resources availability and needs, and offers the greatest potential for diversifying economic options of rural economies."

  "...provides the highest overall response of Forest Service programs to the findings of the 1989 Assessment. It also provides a moderately high level of response to Assessment finding for recreation, wildlife and fish, and water resources through multiple-use management advice to landowners."

Preference for Strategy 5

Number of Respondents: Sixty respondents preferred Strategy 5.

Who Commented: About half of the respondents preferring this strategy were in the **unaffiliated individual** category. Twenty-two of the respondents who preferred this Strategy were from **Federal, State, or county agencies**, and three respondents were from **wildlife groups**.

What Was Said: **Unaffiliated individuals** who preferred this strategy generally did so because they perceived a shift to "amenity" resources and a more holistic approach to forest management on National Forest System lands. Most of the **agencies** that chose Strategy 5 did so because they felt that it had the best benefit/cost ratio, it provided opportunities for diversification of economies, and it recognized water as an important component of the program.

- Shift to "amenity" resources:

  "I believe this strategy comes closer to meeting the intent of legislation that created National Forests and directs their management. National Forests and other public lands should be managed for resources that cannot be provided effectively by the private sector. Intensive management for commodity products should not be a dominant theme on public lands."

  "I prefer Strategy 5, because it is the only strategy which shows any movement in the direction I prefer. Timber and road emphasis is lower than in other strategies, and recreation, wildlife and fish are up."

- More holistic approach to forest management on the national forests:

  "...because it leads to improvement in conditions for nearly all resources and forest health should improve.

  "Particularly because it promotes holistic forest management direction and maintenance of long-term forest health and biological diversity.

  "It is more in keeping with a feeling of long-term sound stewardship of our national resources than with their economic exploitation than are any of the other program options."

- Best benefit/cost ratio:

  "This strategy offers the highest present net values and employment opportunities with one of the lowest net costs..."

  "Strategy 5 provides the largest budget for fish and wildlife enhancement, recreation use, and research related to watershed improvements, and also has the highest present net value of the five strategies when market clearing prices plus consumer surplus are considered."

- Provides diversification in economies:

  "...play an increasing role in the development of resource programs that contribute to diversified local economies based on renewable resources. We believe that Strategy 5...is in the best long term interest of the State."

  "It presents the most balanced mix of provider and consumer opportunities which should add to the stability of local economies."

- Importance of water as a resource is recognized:

  "Responds best to issues regarding the greater fish habitat capability, increased fishing opportunity, and improved water quality."

  "...affords greatest potential for improvements in riparian lands and water quality."

  "Strategy 5 provides the largest budget for fish and wildlife enhancement, recreation use, and research related to watershed improvements..."

Response to Preferences: None of the strategies contained in the Draft Program was selected in its entirety for the recommended long-term strategy. The long-term strategy selected under the Recommended 1990 RPA Program is responsive in varying degrees to strategy preference comments received for all five of the Draft strategies, but is much more like Strategy 5 than any other.

Driven by the future roles of Forest Service programs and responses to contemporary issues, the strategy represents a balanced natural resources program that helps increase the quality and diversity of resource outputs and values. The long-term strategy reflects continued commitment to the philosophy of multiple-use management in a manner that effectively addresses resource demands and opportunities, together with environmental needs and objectives, and is economically efficient.

The strategy is a combination of complementary programs of resource management on National Forest System lands, stimulation of management on State and nonindustrial private forest lands, and the scientific information provided to all landowners. This strategy utilizes the agency's unique strengths and emphasizes cooperation with partners in a synergistic fashion to accomplish mutually beneficial objectives.

The long-term strategy responds to customers' needs, as reflected by public involvement in the Draft 1990 RPA Program (response to roles and issues as well as strategy preference), and to trends identified in the 1989 RPA Assessment. These trends reflect shifts in people's values and attitudes toward natural resource management and uses.

The following table summarizes selected activities, outputs, and costs of the long-term program strategy:

		UNITS	1989	1995	2000	2040
NFS:	Recreation use [1]	MMRVD	256	303	336	533
	Less-than-std Rec. use [2]	Percent	41	18	5	0
	Timber offer	BBF	10.6	10.8	11.1	12.0
	Permitted grazing	MMAUM	9.9	9.3	8.8	9.3
	Watersheds--Class I	Number	1,194	1,292	1,368	1,652
	T&E accomplishments	Number	16	75	121	202
	Wilderness system	MM Acres	32	35	37	39
	Mineral operations	M Number	32	38	38	38
S&PF:	Multiresource mgmt. plans	MM Acres	4.2	9.0	9.5	11.8
	Tree planting	MM Acres	1.2	1.3	1.3	0.8
COSTS:	(Constant 1989 dollars)					
	NFS	MM Dollars	2,092	2,528	2,667	2,831
	S&PF	MM Dollars	51	223	228	145
	Research	MM Dollars	154	207	264	343
	Total	MM Dollars	2,296	2,955	3,160	3,320

[1] Includes wildlife and fish use
[2] Excludes wildlife and fish use

General Comments

A number of other ideas or concerns surfaced during analysis of comments. Several of the most prevalent are described below:

Relationship of the RPA Program to the National Environmental Policy Act (NEPA):

What Was Said: Several respondents raised the question of whether development of the Recommended 1990 RPA Program has followed the NEPA process.

> "We question whether the environmental evaluation contained in the Program is sufficient to meet the legal requirements of the National Environmental Quality Act and other federal laws. We would encourage you to avoid putting the Program at risk by not adequately addressing your procedural requirements."

> "No EIS – is this an admission that RPA is regarded as having no environmental impact? Or is slim Appendix C supposed to be a disclosure of the environmental effects?"

Response to Comments: As a long-term strategic planning document, the Program is not accompanied by an Environmental Impact Statement. Should the Forest Service initiate any legislative action as a result of the Program direction in the 1990 RPA Program, the Forest Service will prepare the appropriate environmental documents specific to the proposed legislation as

needed. Similarly, implementation of the Program through Regional Guides and the forest land and resource management planning process will entail environmental analysis and documentation at appropriate decision points.

Linkage of the RPA Program to the RPA Assessment

What Was Said: Several groups suggested that the direction of Forest Service programs was not consistent with findings in the RPA Assessment. The implicit direction to be drawn from the Assessment was interpreted differently by different groups, but respondents suggested the need to better articulate the linkage between the Program and the Assessment.

> "Program does not illustrate how the Forest Service responds to specific national demands projected in the RPA Assessment."

> "The reader is unable to measure how responsive any of the proposed strategies are to the findings contained in the Draft Assessment."

Response to Comments: Many different programs could be developed from the Assessment depending on the role that the Forest Service should play. In response to reviewers' comments on the Draft 1990 RPA Program, a chapter on the RPA Assessment was added to the Recommended 1990 RPA Program. Chapter 3 summarizes trends from the Assessment and discusses general implications of those trends.

Responsiveness to the RPA Assessment is illustrated throughout the Recommended 1990 RPA Program. For example, the RPA Assessment indicates that the number of federally listed threatened and endangered species on all ownerships has increased by 130 in the past 10 years. The Recommended Program responds to this situation by highlighting it an Issue and addressing the comments which were received.

Water quality is another resource for which the current situation is described in the RPA Assessment. Although efforts to control point sources of pollution have been effective, nonpoint control will be difficult to regulate and expensive to implement. The Recommended Program addresses water quality by displaying it as an Contemporary Issue and responding to relevant comments. Additional examples include the Contemporary Issues of Riparian Management and NIPF timber supply.

Linkage of the RPA Program to Forest Plans

What Was Said: Several respondents suggested the need to better describe the relationship of the RPA Program to forest plans.

> "Information could be included in the document that outlines the relationship between the RPA program, the Forest Plans and NEPA compliance and policy."

> "It is difficult to determine if the role of the Forest Service is to carry out the sum of all the forest plans or if there is a national direction that can be added to these plans. If there is a national direction, what are the boundaries, both legal, biological, and practical? None of these questions are sufficiently addressed in the program document."

The various parts of the overall Forest Service planning process, described in Chapter 2 of the Recommended Program, differ in purpose, scope, timing, and clients, and each part has its own functional advantages. The RPA Program, for example, is where Forest Service programs can be

viewed comprehensively over the long term. Regional guides link the national and local planning processes by channeling information and program guidance between the RPA Recommended Program and the individual forest plans. A forest plan guides management of an individual national forest and can respond to short-term changes in the management situation. Similar examples are appropriate for plans in State and Private Forestry and for Forest Service Research.

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